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SEALED

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2021 SEP 15 PM 4:51

CLERK'S OFFICE
AT BALTIMORE

UNITED STATES OF AMERICA

v.

GERROD DAVIS, and
MARCEL HALL,

Defendants.

* BY TD DEPUTY
CRIMINAL NO. LKG2021cr361

* (Conspiracy to Distribute and Possess
* With Intent to Distribute Cocaine and
* Cocaine Base, 21 U.S.C. § 846;
* Possession With Intent to Distribute
* Cocaine Base, 21 U.S.C. § 841; Aiding
* and Abetting, 18 U.S.C. § 2; Forfeiture,
* 21 U.S.C. § 853; 18 U.S.C. § 2461; Fed.
* R. Crim. P. 32.2(a))

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INDICTMENT

COUNT ONE

(Conspiracy to Distribute and Possess With Intent to Distribute Cocaine Base)

The Grand Jury for the District of Maryland charges that:

Beginning in or about July 2020, and continuing through in or about September 2021, in
the District of Maryland, the defendants,

**GERROD DAVIS and
MARCEL HALL,**

did knowingly and willfully combine, conspire, confederate, and agree with others known and
unknown to the Grand Jury to knowingly, intentionally, and unlawfully distribute and possess with
intent to distribute cocaine, a Schedule II controlled substance, and cocaine base, a Schedule II
controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

Quantity of Controlled Substances Involved in the Conspiracy

With respect to **GERRON DAVIS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is five kilograms or more of a mixture or substance containing a detectable amount of cocaine and 280 grams or more of a mixture and substance containing a detectable amount of cocaine base pursuant to 21 U.S.C. § 841(b)(1)(A)(iii).

With respect to **MARCEL HALL**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a mixture or substance containing a detectable amount of cocaine and 280 grams or more of a mixture and substance containing a detectable amount of cocaine base pursuant to 21 U.S.C. § 841(b)(1)(A)(iii).

21 U.S.C. § 846

18 U.S.C. § 2

COUNT TWO
(Possession With Intent to Distribute Cocaine Base)

The Grand Jury for the District of Maryland further charges that:

On or about September 1, 2021, in the District of Maryland, the defendant,

MARCEL HALL,

did knowingly, intentionally and unlawfully possess with intent to distribute 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant(s) that the United States will seek forfeiture as part of any sentence in accordance with 28 U.S.C. § 2461(c) and the other statutes cited herein, in the event of the Defendant(s)' conviction(s).

Narcotics Forfeiture

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in the Narcotics Count(s), the Defendant(s) convicted of such offense(s), shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense(s); and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense(s).

Substitute Assets

3. Pursuant to Title 21, United States Code, Section 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the defendants up to the value of the property charged with forfeiture in the paragraphs above.

Property Subject to Forfeiture

4. The property to be forfeited includes, but is not limited to, the following:

- a. Approximately \$92,969.00 in U.S. currency seized from 7568 Stonehouse Drive, Glen Burnie, Maryland, during the execution of a search warrant on or about September 1, 2021; *RVM JCM*
- b. four Apple iPhones and chargers seized from 7568 Stonehouse Drive, Glen Burnie, Maryland; and *RVM JCM*
- c. one Apple iPhone and charger seized from 1163 Punjab Drive, Essex, Maryland, during the execution of a search warrant on or about September 1, 2021.

21 U.S.C. § 853

18 U.S.C. § 2461

Fed. R. Crim. P. 32.2(a)

Jonathan F. Lenzner / jcm
Jonathan F. Lenzner
Acting United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Date: 09/15/2021